



Mitchell L. Williamson

Of Counsel, Licensed in New Jersey & New York

Phone: (732) 328-9480 | mwilliamson@bn-lawyers.com

June 28, 2019

Via ECF

Magistrate Judge Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. N208
Courtroom N2E – North Wing
Brooklyn, NY 11201

Re: Isaac Levy v. Platinum Financial Services, et al
United States District Court for the Eastern District of New York (Brooklyn)
1:18-cv-06936 (DLI)-(RER)

Dear Judge Reyes:

The undersigned represents Defendant Palisades Collection, LLC in the above referenced matter and I write in response to Plaintiff's letter motion to the Court dated June 24, 2019 (D.E. 71) seeking responses to from Palisades Plaintiff's 2nd and 3rd set of discovery demands. On June 25th the undersigned spoke with Plaintiff's counsel and advised that I was finalizing Palisades responses to both sets of discovery demands and counsel agreed to give me until the next day, the 26th to serve them. On June 26th, as agreed I served Palisades responses to both sets of discovery demands, and produced 275 pages of documents as part of that production. As a result of same the Court should consider Plaintiff's complaints as detailed in his June 24th letter as moot and deny the requested relief.

If Plaintiff has a specific complaint as to any specific response at this point it is requested that he be Ordered to put same in writing explaining both why he believes the specific response is insufficient and where appropriate why he believes he is entitled to any information not provided. Following that protocol will allow Palisades the opportunity to amend or respond in writing as to its position why amendment will not be made.

Thank you for your consideration of this matter.

Respectfully submitted,
BARRON & NEWBURGER, P.C.

Mitch Williamson

Mitchell L Williamson

CC: All Counsel